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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 INTERNATIONAL INSTITUTE OF
12 MANAGEMENT,

13 Plaintiff,

14 vs.

15 ORGANIZATION FOR ECONOMIC
COOPERATION AND DEVELOPMENT
16 (OECD)

17 AND

18 PROFESSOR JOSEPH STIGLITZ

19 AND

20 JOHN DOE,

21 Defendants.
22

CASE NO. 2:18-cv-01748-JCM-GWF

STIPULATION FOR EXTENSION TO
RESPOND TO COMPLAINT [ECF NO. 1]

(First Request)

23 Plaintiff INTERNATIONAL INSTITUTE OF MANAGEMENT (“Plaintiff”) and
24 Defendant PROFESSOR JOSEPH STIGLITZ (“Defendant”) by and through their
25 undersigned counsel (collectively the “Parties”), for good cause shown, hereby stipulate
26 and agree to extend Defendant’s deadline to respond to Plaintiff’s Complaint [ECF No. 1]
27 to January 22, 2019. This is the Parties’ first extension request.
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1 Pursuant to Fed. R. Civ. P. 6(b)(1) and LR 7-1, good cause exists to grant this
2 extension to respond for the following reasons:

3 1. On September 10, 2018, Plaintiff filed its Complaint. (ECF No. 1).

4 2. Plaintiff served the Complaint and Summons on Defendant on November
5 30, 2018. (ECF No. 11.)

6 3. Defendant's Response is currently due December 21, 2018.

7 4. Counsel for Defendant was only recently retained, and requires more time
8 to prepare an appropriate response.

9 5. By entering into this stipulated extension request, Defendant is not waiving
10 any defenses or motions to bring such defenses, including but not limited to, any motion
11 for lack of personal jurisdiction.

12 6. The Parties agreed to the extension requested herein.

13 7. This stipulated extension request is sought in good faith and is not made for
14 the purpose of delay.

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8. Therefore, the Parties agree to extend Defendant's deadline to respond to Plaintiff's Complaint to January 22, 2019.

DATED this 17th day of December, 2018

LEWIS BRISBOIS BISGAARD
& SMITH LLP

BAUMAN LOEWE WITT & MAXWELL,
PLLC

/s/ Josh Cole Aicklen
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IT IS SO ORDERED:

George Foley Jr.

UNITED STATES MAGISTRATE JUDGE

Dated: December 18, 2018.